

EXHIBIT 7

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CELLULOSE MATERIAL SOLUTIONS,)	
LLC,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	3:22-CV-03141-LB
SC MARKETING GROUP, INC.,)	
)	
Defendant.)	
_____)	

VIDEOTAPED DEPOSITION OF PAUL TURNER
30(b)(6) deposition of Turner Fiberfill
Los Angeles, California
Thursday, September 14, 2023
Volume I

Stenographically Reported by:
AMANDA J. KALLAS
CSR Number 13901

Job Number 2624

PAGES 1 - 66

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CELLULOSE MATERIAL SOLUTIONS vs SC MARKETING
TURNER, PAUL 09/14/2023

30(b)(6), Job 25860

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
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4 CELLULOSE MATERIAL SOLUTIONS,)
LLC,)
5)
6 Plaintiff,)
7 vs.) Case No.
8 SC MARKETING GROUP, INC.,) 3:22-CV-03141-LB
9 Defendant.)
10

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13
14
15 Videotaped deposition of PAUL TURNER, Volume I,
16 taken on behalf of Plaintiff, at 633 West Fifth
17 Street, Suite 1550, Los Angeles, California
18 90071-2048, beginning at 9:38 a.m. and ending at
19 11:14 a.m. on Thursday, September 14, 2023, before
20 Amanda J. Kallas, Certified Shorthand Reporter
21 Number 13901.
22
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CELLULOSE MATERIAL SOLUTIONS vs SC MARKETING
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30(b)(6), Job 25860

6

1 Thursday, September 14, 2023; Los Angeles,

2 California

3 9:38 a.m.

4 ---oOo---

5 THE VIDEOGRAPHER: Good morning.

6 My name is Craig Schumacher. I am the
7 videographer for today. I represent Fortz Legal in
8 Grand Rapids, Michigan.

9 I am not financially interested in the
10 action, nor am I a relative or employee of any of
11 the attorneys or any of the parties.

12 Today's date is September 14th, 2023. The
13 time is approximately 9:38 a.m. This deposition is
14 being taken at 633 West Fifth Street in Los Angeles,
15 California. The case number is 3:22-cv-03141-LB.
16 This case is entitled "Cellulose Material Solutions
17 versus SC Marketing Group, Incorporated."

18 This is the 30(b)(6) deposition of Paul
19 Turner. The court reporter today is Amanda Kallas.

20 Will each of the attorneys present please
21 state your appearance for the record.

22 MR. ROGGE: My name is Mark Rogge from the
23 firm of Dickinson Wright representing the plaintiff,
24 Cellulose Material, and I am joined on video by
25 Chris Mitchell.

CELLULOSE MATERIAL SOLUTIONS vs SC MARKETING
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30(b)(6), Job 25860

7

1 MR. MITCHELL: This is Chris Mitchell from
2 Dickinson Wright.

3 MR. SMITH: And Ryan Smith from Wilson
4 Sonsini, on behalf of the defendant and the witness.

5 THE VIDEOGRAPHER: You may swear the witness.

6 ---oOo---

7 PAUL TURNER,
8 having been duly administered an oath by the
9 court reporter, was examined and testified as
10 follows:

11 THE WITNESS: Yes I do.

12 THE STENOGRAPHER: Thank you.

13 Go ahead, Counsel.

14 ---oOo---

15 EXAMINATION

16 BY MR. ROGGE:

17 Q Can you state your name for the --

18 A Paul --

19 Q -- record?

20 A -- Turner.

21 Q And what's your address?

22 A My home address?

23 Q Or the business address.

24 A Oh. 1600 Date Street, Montebello,
25 California.

1 A So my son must have done -- yeah. He asked
2 for this -- somebody asked for the specs and --
3 yeah, I guess this is probably right.

4 Q So looking at this, what do you believe the
5 specifications are in the Renewliner?

6 A It's whatever this says here. 65 percent --
7 15 to 20 denier polyester and 35 percent low-melt.
8 One pound cubic foot density. That's -- that's
9 right.

10 Q Yeah, you believe that's the correct
11 specification for the Renewliner?

12 A Yeah, within a few percentage. I mean, it
13 may be 70/30, but I'm sure that's very close.

14 Q Do you know if you've changed the -- deviated
15 significantly from that formula in making the
16 Renewliner over the years?

17 A Yeah, maybe 5 percentage difference either
18 way. I mean, maybe it was 70/30 -- I mean, but 4 --
19 maybe. Not -- not much. Very small percentage.

20 Q So you would say these are roughly correct
21 numbers?

22 A Roughly correct, yes.

23 Q And the -- and this has been roughly the
24 correct specification for the entire time you've
25 made the product?

1 A Yeah, as far as I can recall.

2 Q As far as you can recall.

3 You don't recall specifically using other
4 specifications?

5 A No, I don't recall any other. Right. I
6 mean, not -- within just a few percentage. If there
7 was a change, it wouldn't be very much.

8 Q Do you know the length of the fibers?

9 A Mostly we use two-and-a-half inch. Could be
10 two, two inch -- between two and three inch. I'm
11 sorry. Between two and three inch.

12 Q Is that for both the low-melt and the --

13 A Yes.

14 Q When you receive these fibers, do they come
15 premixed?

16 A No.

17 Q So do you combine them to make the batt?

18 A Correct, yes.

19 Q Could you, in your own words, describe how
20 that process works, of -- how they get from being a
21 separate group of fibers and how they get mixed?

22 A Your people came and saw it.

23 Q I came and saw it.

24 A Oh, you were there, so you know. So you know
25 what it looks like.

CELLULOSE MATERIAL SOLUTIONS vs SC MARKETING
TURNER, PAUL 09/14/2023

30(b)(6), Job 25860
66

1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.
3

4 I, AMANDA KALLAS, C.S.R. Number 13901, in and for
5 the State of California, do hereby certify:

6 That prior to being examined, the witness named in
7 the foregoing deposition was by me duly sworn to testify
8 to the truth, the whole truth, and nothing but the truth;

9 That said deposition was taken down by me in
10 shorthand at the time and place therein named and
11 thereafter reduced to typewriting under my direction, and
12 the same is a true, correct, and complete transcript of
13 said proceedings;

14 That if the foregoing pertains to the original
15 transcript of a deposition in a federal case, before
16 completion of the proceedings, review of the transcript
17 { } was {x} was not required.

18 I further certify that I am not interested in the
19 event of this action.

20 Witness my hand this ____18th____ day of
21 ____September____, 2023.
22

23 *Amanda Kallas*
24

25 AMANDA KALLAS, C.S.R. Number 13901

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